

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-256-C

Application of)
Combined Public Communications, LLC)
for a Certificate of Public Convenience and Necessity)
to Provide Intrastate Resold Institutional)
Telecommunications Services and for Alternative)
Regulation Within the State of South Carolina)

DIRECT TESTIMONY OF BRETT E. RUSCHMAN
ADOPTING THE DIRECT TESTIMONY OF JONATHAN NEAL BROOKS, IV
FOR COMBINED PUBLIC COMMUNICATIONS, LLC

1 **Q. Will you please state your name and business address.**

2 A. My name is Brett E. Ruschman. My business and mailing address is 100 Aqua Drive, Cold
3 Spring, KY 41076.
4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am currently Vice President of Technology for Combined Public Communications, LLC
7 (“CPC”). I have been employed by CPC since 2010. As Vice President of Technology
8 my responsibilities include overseeing various technical aspects of CPC’s operations and I
9 am familiar with all aspects of the Company’s operations.
10

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of my testimony is to present evidence on the financial, technical and
13 managerial abilities of CPC to provide specialized institutional telecommunications
14 services to inmates and other incarcerated persons in correctional and confinement
15 institutions throughout the State of South Carolina, and to describe the service CPC
16 proposes to offer.
17

18 **Q. Has CPC registered to do business in South Carolina?**

19 A. Yes. CPC is registered to transact business in South Carolina. Our Certificate of Authority
20 is attached to our application in Exhibit A.
21

22 **Q. Please explain the Company's corporate structure.**

23 A. CPC was originally incorporated in the State of Ohio in November 1994 as Combined
24 Public Communications, Inc. On November 21, 2016 the Company converted to a
25 Delaware limited liability company.
26

27 **Q. Please describe the services CPC proposes to offer.**

28 A. CPC proposes to provide automated operator-assisted collect and prepaid calling services
29 to inmates and other incarcerated persons in confinement institutions throughout the State
30 of South Carolina. CPC’s institutional calling services will be provided for use by inmates

1 and other incarcerated persons in confinement institutions who place calls to family
2 members, attorneys, bail bondsmen, or any other individuals the inmate is permitted to
3 contact, subject to restrictions imposed by the correctional facility management personnel.
4 CPC does not offer presubscribed services. CPC's telephone instruments are placed in
5 detention areas such as cell blocks or day rooms. Each instrument is connected to a central
6 control unit which restricts and controls calls placed by inmates. CPC's system and services
7 allow inmates and other incarcerated persons to remain in contact with family, friends and
8 other associates while still providing facility administrators with the necessary control over
9 inmate communications.

10 Automated collect or prepaid calls may be placed by inmates within the confinement
11 facility. These calls are then backhauled to the Public Switched Telephone Network using
12 third-party vendors. CPC's system is designed so that calls are completed only to those
13 called parties who specifically accept the charges for a call. Equipment utilized by CPC
14 requires a positive response from the called party before the connection is established and
15 billing can begin.

16 In addition to call processing, CPC's systems offer restrictive call blocking and screening.
17 These features provide the correctional facility with the maximum degree of control over
18 telecommunications services and help to minimize fraud. Call blocking prevents calls to
19 directory assistance, "0-", 800 numbers, pay-per-call services, and emergency numbers
20 (including 911) in order to reduce prank calls and fraudulent use of long distance services.
21 Access to other interexchange carriers is also denied. Call screening serves to eliminate
22 harassing or threatening calls to individuals such as judges, sheriffs, witnesses or jury
23 members. These two features also allow the institution to enforce telephone curfews
24 (without manual intervention) by pre-setting the hours during which the system will

1 process calls from a given telephone instrument.

2 As an institutional services provider, CPC does not have presubscribed customers and does
3 not bill directly for its service. As a result, CPC does not assign telephone numbers. CPC's
4 institutional calling services are for the use of inmates and other incarcerated persons in
5 confinement institutions who place calls to family members, attorneys, bail bondsmen, or
6 any other individuals the inmate is permitted to contact, subject to restrictions imposed by
7 the correctional facility management personnel.

8
9 **Q. Does CPC own any network switches or transmission facilities used in routing calls?**

10 A. No, CPC uses third-party vendors to deliver calls.
11

12 **Q. How are billing errors, complaints and trouble reports handled?**

13 A. CPC provides strong customer support service. For customer service inquiries, customers
14 can either email or call a CPC representative. CPC's contact information is available on
15 the website. CPC's hours of operation are Monday through Friday 8:00 AM to 8:00 PM
16 and Saturday 2:00 PM to 6:00 PM EST, closed Sundays and major holidays. Customers
17 placing calls after hours may leave a voice mail which will be returned the following day.
18 When circumstances require, additional support is provided from the Company's
19 headquarters location between 9am and 5pm weekdays.
20

21 **Q. Where is CPC currently certificated?**

22 A. CPC is currently certificated in the following state jurisdictions: Alabama, Florida,
23 Georgia, Illinois, Indiana, Kansas, Kentucky, Mississippi, North Carolina, Ohio,
24 and Tennessee.
25

26 **Q. Describe CPC's financial ability to operate as a telecommunications provider.**

27 A. CPC has sufficient financial resources to successfully operate in South Carolina. As
28 evidence of the viability of its financial plans, CPC has provided its confidential financial
29 statements under seal to the Commission.

1
2 **Q. Where in South Carolina does CPC intend to offer its services?**

3 A. CPC intends to offer its correctional calling services throughout the entire State of South
4 Carolina.

5
6 **Q. Has CPC requested alternative regulation of its interexchange services?**

7 A. CPC requests that it be allowed to file a tariff that includes maximum rates for its services,
8 accompanied by a current price list showing rates at or below the maximum rates. CPC
9 further requests the authority to revise its current price list below the maximum rates by
10 filing revised price lists from time to time. CPC commits that its actual charges at any
11 point in time will be the charges shown on the current price list on file with the Commission
12 and the Office of Regulatory Staff.

13
14 **Q. Why is the company seeking exemptions from any rules requiring that its books be
15 kept in conformance with the uniform system of accounts?**

16 A. The USOA was developed by the Federal Communications Commission as a means of
17 regulating telecommunications companies subject to rate base regulation. As a competitive
18 carrier, CPC will not be subject to rate base regulation and therefore requests Commission
19 approval for CPC to maintain its books in accordance with Generally Accepted Accounting
20 Principals ("GAAP").

21
22 **Q. Why are you seeking a waiver of the requirement that your books and records be
23 kept in South Carolina pursuant to 26 SC Regs. 103-610?**

24 A. CPC's principal office is located in Kentucky, and in the absence of such a waiver, CPC
25 would have to assume additional expenses to maintain records and reports in an office in
26 South Carolina. CPC will maintain the required records at its headquarters and will make

1 them available to the Commission and ORS upon request.

2
3 **Q. How will South Carolina consumers benefit from CPC's services?**

4 A. Certification of CPC will serve the public interest by allowing competitive carriers to enter
5 the institutional calling services market, offering new and better technology in the
6 provision of service and additional choices for institutional communications, thus reducing
7 costs and improving security.

8
9 **Q. Have you reviewed the Direct Testimony of Jonathan Brooks that was filed in this**
10 **proceeding, and do you understand and agree with Mr. Brooks' testimony?**

11 A. Yes.

12
13 **Q. Are you able to answer questions in support of the company's application filed in this**
14 **proceeding?**

15 A. Yes.

16
17 **Q. Do you adopt Mr. Brooks' testimony as your own for this proceeding?**

18 A. Yes, as included in this document.